

Virginia Stationary Source Operating Permit (Title V)

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-305 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Permit Number

PRO-50833

Effective Date

May 17, 2001

Expiration Date

May 17, 2006

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Mundet, Inc.
Mailing Address:	P.O. Box 70 Colonial Heights, VA 23834
Facility Name:	Roslyn Converters
DEQ Registration Number:	50833
Facility Location:	1106 West Roslyn Road Colonial Heights, VA 23834

Permit Issued this Seventeenth day of May, 2001

Dennis H. Treacy, Director
Department of Environmental Quality

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I. Facility Information

Permittee

Mundet, Inc.
P.O. Box 70
Colonial Heights, VA 23834

Facility

Roslyn Converters
1106 West Roslyn Road
Colonial Heights, VA 23834

Responsible Official

Mr. Michael W. Gay
Plant Manager
(804)748-3319

Contact person

Mr. Gordon Gunn
Environmental, Health, and Safety
(804) 748-3319

AIRS Identification Number: 51-570-0105

Facility Description: SIC Code Number -2754 (Commercial Printing, Gravure) -There are three rotogravure printing presses, supported by natural gas-fired hot oil boilers which supply process heat for drying. Regenerative thermal oxidizer controls emissions from three rotogravure presses and a parts washer

II. Emissions Unit Specific Requirements

A. Insignificant Emission Unit Inventory List

Table No. II A. Insignificant Emission Unit Inventory List				
Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity* (5-80-720 C.)
H1	Natural Gas Fired Fulton Fluid Heater	5-80-720 B., C.2.a.	PT, PM10, SO ₂ , NO ₂ , CO, VOC	6.0 mmbtu/hr input
H2	Natural Gas Fired Fulton Fluid Heater	5-80-720 B., C.2.a.	PT, PM10, SO ₂ , NO ₂ , CO, VOC	6.0 mmbtu/hr input
HC1	Natural Gas Fired Modine Space Heater (Ceiling Mounted)	5-80-720 A.	PT, PM10, SO ₂ , NO ₂ , CO, VOC	0.05 mmbtu/hr input
HC2	Natural Gas Fired Modine Space Heater (Ceiling Mounted)	5-80-720 A.	PT, PM10, SO ₂ , NO ₂ , CO, VOC	0.05 mmbtu/hr input
HC3	Natural Gas Fired Modine Space Heater (Ceiling Mounted)	5-80-720 A.	PT, PM10, SO ₂ , NO ₂ , CO, VOC	0.05 mmbtu/hr input
HC4	Natural Gas Fired Modine Space Heater (Ceiling Mounted)	5-80-720 A.	PT, PM10, SO ₂ , NO ₂ , CO, VOC	0.05 mmbtu/hr input

B. Significant Emissions Unit Inventory List

(1) Process Units

Table No. II B. 1. Significant Emissions Unit Inventory List – Process Units				
Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
P1	S1	8-Color Station Rotogravure Printing Press with a web width of 40 inches (Used for cigarette tipping paper)	Rotomec/(exact date of manufacture unknown) upgraded in 1996	2,000 ft./min and 3,504.6 lbs of VOCs/hr
P2	S1	2-Color Station Coater associated with a rotogravure press with a web width of 48 inches (Used for cigarette tipping paper)	Custom built and designed in-house for rotogravure printing in the 1940's (exact date of manufacture is unknown)	2,000 ft./min. and 876.1 lbs of VOCs/hr
P3	S1	6-Color Station Rotogravure Printing Press with a web width of 48 inches (Used for cigarette tipping paper)	Rotomec 1969 (exact date of manufacture unknown) upgraded in 1996	2,000 ft./min. and 3,320.1lbs of VOCs/hr
PW1	S1	Distillation Unit and Parts Washer	Renzmann/ 2/86	437.5 lbs of VOCs/hr
T1	N/A	One Unpainted Variable Space Solvent Storage Tank	Capital Iron Works Constructed in 1992, installed 4/1/93	8,330 gals.
T2	N/A	One Unpainted Variable Space Solvent Storage Tank	Capital Iron Works Constructed in 1992, installed 4/1/93	8,330 gals.

(2) Pollution Control Equipment

Table No. II B. 2 Pollution Control Equipment				
Stack No./ Emission Unit Nos.	Control Equipment Description	Manufacturer and Date of Construction	Capture / Destruction Efficiency*	Pollutant
S1/P1, P2, P3 & PW1	Regenerative Thermal Oxidizer	Smith Engineering Model no. AB50HX95E1787	Capture eff.*: 100% Design Destruction eff.*: 95 / 90% Actual eff.*: 96.9% and greater	VOC

* The inclusion of values for equipment rated capacities and control equipment efficiencies in Table No. II A. and Table Nos. II B. 1 and 2 (above), are for informational purposes and are not applicable requirements.

C. Emission Unit Limitations

Table No. II.C. Allowable Emissions Summary of Criteria Pollutants												
Unit ID	Cond./ Ref. No.	PM ₁₀		NO _x		SO ₂		CO		VOC*		
		Lbs/ Hr	Tons/ yr	Lbs/ hr	Tons/ yr	Lbs/ hr	Tons/ yr	Lbs/ hr	Tons/ Yr	Lbs/ Hr	Lbs/day	Tons/ yr
P1	Table II.D.1	NA	NA	NA	NA	NA	NA	NA	NA	350.5	8,411.0	162.0
P2	Table II.D.2	NA	NA	NA	NA	NA	NA	NA	NA	87.6	2,102.6	90.0
P3	Table II.D.3	NA	NA	NA	NA	NA	NA	NA	NA	166.0	3,984.2	143.0
PW1	Table II.D.5	NA	NA	NA	NA	NA	NA	NA	NA	21.9	524.4	10.0

* From printing/coating/partswashing- not inclusive of VOCs from combustion as the heaters are insignificant emission units.

There are no allowable emissions of Hazardous Air Pollutants (HAPs). According to Roslyn Converters, Inc. the one HAP they do use dibutyl phthalate (which has a low vapor pressure) is not released as an emission and either stays with the product or is removed in Roslyn's hazardous waste stream.

D. Emission Unit Specific Permit Terms

(1) P1 Eight (8) Station Color Rotomec Rotogravure Printing Press with a Web Width of 40 Inches

Emissions from the operation of the (P1) eight (8) station Rotomec Press shall not exceed the limits specified below:

Table II.D.1 Emission Limitations for (P1) Eight (8) Station Color Rotomec Rotogravure Printing Press with a Web Width of 40 Inches

Regulated Pollutant	Limitation/Standard			Applicable Requirement	Reference Method*
	Lbs/hr ¹	Lbs/Day ²	Tons/yr ³		
VOC**	350.5	8,411.0	162.0	Condition no. 17, 1/25/01	EPA Reference Method 25A, 40 CFR 60, Appendix A

- 1 The hourly emission limits established in Table II.D.1 shall be calculated based on daily VOC calculations (as per AQP-4) from each line divided by the number of hours of operations per day.
- 2 The daily emission in Table II.D.1 shall be calculated as according to AQP-4 on pages 16 - 19.
- 3 The annual emissions in Table II.D.1 shall be calculated monthly as the sum of each consecutive 12 month period.

*: Or equivalent EPA Test Method. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)

**.: From printing - not inclusive of VOCs from combustion as the heaters are insignificant emission units.

Limitations

1. **Emission Controls and Control Efficiency** - Volatile organic compound (VOC) emissions from the **(P1) eight (8) station Rotomec rotogravure printing press**, the (P2) two (2) station rotogravure paper coater and the (PW1) parts press washer shall be controlled by a total enclosure and a thermal oxidizer with a destruction efficiency of 90 percent. The thermal oxidizer shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H and 9 VAC 5-50-260, Condition no. 4 of the NSR permit issued 1/25/01)
2. **Control Parameters and Monitoring Devices** - Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400°F and a residence time of 1 second. The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01 and 9 VAC 5-50-20)
3. **Total Enclosure** - The total enclosure shall meet the following criteria:
 - a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;

- b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
- c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
- d. All access doors and windows shall be closed during routine operation of the presses.

(9 VAC 5-80-10 H, Condition no. 7 of the NSR permit issued 1/25/01 and 9 VAC 5-50-260)

- 4. **Throughput** - The throughput of VOC to the (P1) eight (8) station Rotomec press shall be no more than 3,504.6 pounds per hour, 84,110.4 pounds per day, and 1,620.0 tons per year. The annual VOC throughput to the (P1) eight (8) station Rotomec press shall be calculated as the sum of each consecutive 12 month period.
(9 VAC 5-80-10 H, Condition no. 9 of the NSR permit issued 1/25/01)
- 5. **Visible Emission Limit** - Visible emissions from the thermal oxidizer shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-80, 9 VAC 5-50-260 and 9 VAC 5-50-20, Condition no. 20 of the NSR permit issued 1/25/01)

Additional Required Periodic Monitoring and Recordkeeping, see pages 16 - 19

Periodic Monitoring and Recordkeeping

- 1. Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400°F and a residence time of 1 second. **The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.**
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01)
- 2. The thermal oxidizer's combustion zone temperature readout graph shall be reviewed to determine if it is in compliance with the required 1400°F minimum combustion zone temperature and recorded once per shift.
(9 VAC 5-80-110 E and F and 9 VAC 5-50-20)
- 3. An annual calibration shall be performed on the current thermocouples with a redundant thermocouple and annual records shall be kept stating the date the calibration was performed along with the calibration results.
(9 VAC 5-80-110 E and F and 9 VAC 5-50-20)

4. Periodic Monitoring of the average facial velocity of a minimum of 200 ft/min which corresponds to a pressure drop of 0.013 mm of Hg or 0.007 in. of H₂O as required for a permanent total enclosure designation shall be demonstrated by a differential pressure meter across the enclosure (the entire building is the permanent total enclosure). The differential pressure meter records shall be recorded and reviewed once per shift. In addition, verification of direction of air flow is inward shall be verified by a negative pressure which shall be recorded once per shift.
(9 VAC 5-80-110 E and F)
5. The emissions from the thermal oxidizer shall be observed visually at least once each calendar week for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

(2) P2- Two (2) Station Color Coater associated with a Rotogravure Press with a Web Width of 48 Inches

The following emissions from the operation of the (P2) two (2) Station Color Coater Press associated with a web width of 48 inches shall not exceed the limits specified below:

Table II.D.2 Emission Limitations for P2 - Two (2) Station Color Coater associated with a Rotogravure Press with a Web Width of 48 Inches					
Regulated Pollutant	Limitation/Standard			Applicable Requirement	Reference Method*
	Lbs/hr ¹	Lbs/day ²	Tons/yr ³		
VOC**	87.6	2,102.6	90.0	Condition no. 18, 1/25/01	EPA Reference Method 25A, 40 CFR 60, Appendix A

1 The hourly emission limits in Table II.D.2 shall be calculated based on daily VOC calculations (as per AQP-4) from Line 3 divided by the number of hours of operations per day.

2 The daily emission in Table II.D.2 shall be calculated as according to AQP-4 on pages 16 - 19

3 The annual emissions in Table II.D.2 shall be calculated monthly as the sum of each consecutive 12 month period.

*. Or Equivalent EPA Test Methods. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)

**. From coating/inks - not inclusive of VOCs from combustion as the heaters are insignificant emission units.

Limitations

1. **Emission Controls and Control Efficiency** - Volatile organic compound (VOC) emissions from the (P1) eight (8) station Rotomec rotogravure printing press, the **(P2) two (2) station color rotogravure paper coater** and the (PW1) parts press washer shall be controlled by a total enclosure and a thermal oxidizer with a destruction efficiency of 90 percent. The thermal oxidizer shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H and 9 VAC 5-50-260, Condition no. 4 of the NSR permit issued 1/25/01)
2. **Control Parameters and Monitoring Devices** - Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400°F and a residence time of 1 second. The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01 and 9 VAC 5-50-20)
3. **Total Enclosure** - The total enclosure shall meet the following criteria:
 - a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;
 - b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
 - d. All access doors and windows shall be closed during routine operation of the presses.
(9 VAC 5-80-10 H, Condition no. 7 of the NSR permit issued 1/25/01 and 9 VAC 5-50-260)
4. **Throughput** - The throughput of VOC to the (P2) two (2) station color paper coater shall be no more than 876.1 pounds per hour, 21,027.6 pounds per day and 900.0 tons/yr. Annual VOC throughput shall be calculated as the sum of each consecutive 12 months period.
(9 VAC 5-80-10 H, Condition no. 11 of the NSR permit issued 1/25/01)

Periodic Monitoring and Recordkeeping:

Additional Required Periodic Monitoring and Recordkeeping, see pages 16 - 19.

1. Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400°F and a residence time of 1 second. **The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.**
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01)
2. The thermal oxidizer's combustion zone temperature readout graph shall be reviewed to determine if it is in compliance with the required 1400°F minimum combustion zone temperature and recorded once per shift.
(9 VAC 5-80-110 E and F)
3. An annual calibration shall be performed on the current thermocouples with a redundant thermocouple and annual records stating the date the calibration was performed along with the calibration results.
(9 VAC 5-80-110 E and F)
4. Periodic Monitoring of the average facial velocity of a minimum of 200 ft/min which corresponds to a pressure drop of 0.013 mm of Hg or 0.007 in. of H₂O as required for a permanent total enclosure designation shall be demonstrated by a differential pressure meter across the enclosure (the entire building is a permanent total enclosure). The differential pressure meter records shall be recorded and reviewed once per shift. In addition, verification of direction of air flow is inward shall be verified by a negative pressure which shall be recorded once per shift.
(9 VAC 5-80-110 E and F)
5. The emissions from the thermal oxidizer shall be observed visually at least once each calendar week for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. If the emissions unit is observed having any visible emissions, it shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

(3) P3- Six (6) Station Color Rotogravure Printing Press with a Web Width of 48 Inches

Emissions from the operation of the (P3) six (6) station color rotogravure printing press shall not exceed the limits specified below:

Table II.D.3 Emission Limitations for (P3) Six (6) Station Color Rotogravure Printing Press with a Web Width of 48 Inches

Regulated Pollutant	Limitation/Standard			Applicable Requirement	Reference Method*
	Lbs/hr ¹	lbs/day ²	Tons/yr ³		
VOC**	166.0	3,984.2	143.0	Condition no. 16, 1/25/01	EPA Reference Method 25A, 40 CFR 60, Appendix A

- 1 The hourly emission limits in Table II.D.3 shall be calculated based on daily VOC calculations (as per AQP-4) from Line 3 divided by the number hours of operations per day.
- 2 The daily emission in Table II.D.3 shall be calculated as according to AQP-4 on pages 16 - 19.
- 3 The annual emissions in Table II.D.3 shall be calculated monthly as the sum of each consecutive 12 month period.

*: Or Equivalent EPA Test Methods. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)

**.: From printing - not inclusive of VOCs from combustion as the heaters are insignificant emission units.

Limitations

1. **Emission Controls and Control Efficiency** – Volatile organic compound (VOC) emissions from the (P3) six (6) station rotogravure printing press shall be controlled by a total enclosure and a thermal oxidizer with a destruction efficiency of 95 percent. The thermal oxidizer shall be provided with adequate access for inspection.
(9 VAC 5-50-260 and 9 VAC 5-80-10 H, Condition no. 3 of the NSR permit issued 1/25/01)
2. **Control Parameters and Monitoring Devices** - Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400° F and a residence time of 1 second. The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01 and 9 VAC 5-50-20)
3. **Total Enclosure** - The total enclosure shall meet the following criteria:
 - a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;

- b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
- c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
- d. All access doors and windows shall be closed during routine operation of the presses.

(9 VAC 5-80-10 H, Condition no. 7 of the NSR permit issued 1/25/01 and 9 VAC 5-50-260)

- 4. **Throughput** - The throughput of VOC to the (P3) six (6) station color rotogravure printing press shall be no than 3,320.1 pounds per hour, 79,683.4 pounds per day, and 2,960.0 tons per year. Annual VOC throughput to the (P3) six (6) station color rotogravure printing press shall be calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-10 H, Condition no. 9 of the NSR permit issued 1/25/01)

- 5. **Visible Emission Limit** - Visible emissions from the thermal oxidizer shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

(9 VAC 5-50-80, 9 VAC 5-50-260, and 9 VAC 5-50-20, Condition no. 20 of the NSR permit issued 1/25/01)

Periodic Monitoring and Recordkeeping

Additional Required Periodic Monitoring and Recordkeeping, see pages 16 - 19.

- 1. Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400° F and a residence time of 1 second. **The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.**
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01)
- 2. The thermal oxidizer's combustion zone temperature readout graph shall be reviewed to determine if it is in compliance with the required 1400°F minimum combustion zone temperature and recorded once per shift.
(9 VAC 5-80-110 E and F)
- 3. An annual calibration shall be performed on the current thermocouples with a redundant thermocouple and annual records stating the date the calibration was performed along with the calibration results.
(9 VAC 5-80-110 E and F)
- 4. The differential pressure shall be recorded once per shift and reviewed to demonstrate the thermal oxidizer is operating in compliance with the one second residence time. The one second residence time will be determined by the determined volumetric air flow rate.
(9 VAC 5-80-110 E and F)

5. Periodic Monitoring of the average facial velocity of a minimum of 200 ft/min which corresponds to a pressure drop of 0.013 mm of Hg or 0.007 in. of H₂O as required for a permanent total enclosure designation shall be demonstrated by a differential pressure meter across the enclosure (the entire building is the permanent enclosure). The differential pressure meter records shall be recorded and reviewed once per shift. In addition, verification of direction of air flow is inward shall be verified by a negative pressure which shall be recorded once per shift.
(9 VAC 5-80-110 E and F)
6. The emissions from the thermal oxidizer shall be observed visually at least once each calendar week for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

(4) (T-1 & T-2) Two Unpainted Variable Space Solvent Storage Tanks

Limitation

1. **Emission Controls** - Volatile organic compound (VOC) emissions from the (T-1 & T-2) two unpainted stored solvent tanks shall be controlled by the use of a variable vapor space tank.
(9 VAC 5-80-10 H and 9 VAC 5-50-260, condition no. 5 of the NSR permit issued 1/25/01)
2. **Throughput** - The throughput of VOC to each (T-1 & T-2) variable space solvent tanks shall not exceed 686,000 gallons per year of solvent for a total of 1,372,000 gallons per year calculated as the sum of each consecutive 12 month period.
(9 VAC 5-80-10 H, condition no. 13 of the NSR permit issued 1/25/01)

Periodic Monitoring and Recordkeeping

See page 18

(5) PW1 Renzman Distillation Unit and Parts Washer

Emissions from the operation of the (PW1) Renzman distillation unit and parts washer shall not exceed the limits specified below:

Table II.D.5 Emission Limitations for (PW1) Renzman distillation unit and partswasher					
Regulated Pollutant	Limitation/Standard			Applicable Requirement	Reference Method*
	Lbs/hr	Lbs/Day ¹	tons/yr ²		
VOC	21.9	524.4	10.0	Condition no.15, 1/25/01	EPA Reference Method 25A, 40 CFR 60, Appendix A

- 1 The daily emission in Table II.D.5 shall be calculated as according to AQP-4 on pages 16 - 19.
- 2 The annual emissions in Table II.D.5 shall be calculated monthly as the sum of each consecutive 12 month period.

*: Or equivalent EPA Reference Test Methods. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)

Limitations

1. **Emission Controls and Control Efficiency** - Volatile organic compound (VOC) emissions from the (P1) eight (8) station Rotomec rotogravure printing press, the (P2) two (2) station rotogravure paper coater and the **(PW1) renzman distillation unit and parts press washer** shall be controlled by a total enclosure and a thermal oxidizer with a destruction efficiency of 90 percent. The thermal oxidizer shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H and 9 VAC 5-50-260, Condition no. 4 of the NSR permit issued 1/25/01)
2. **Control Parameters and Monitoring Devices** - Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400°F and a residence time of 1 second. The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01 and 9 VAC 5-50-20)
3. **Total Enclosure** - The total enclosure shall meet the following criteria:
 - a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;

- b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
- c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
- d. All access doors and windows shall be closed during routine operation of the presses.

(9 VAC 5-80-10 H, Condition no. 7 of the NSR permit issued 1/25/01 and 9 VAC 5-50-260)

- 4. **Throughput** - The throughput of VOC to the (PW1) renzman distillation unit and press parts washer shall be no more than 437.5 pounds per hour, 3,500.0 pounds per day and 100 tons/yr. Annual VOC throughput shall be calculated as the sum of each consecutive 12 months period.

(9 VAC 5-80-10 H, Condition no. 14 of the NSR permit issued 1/25/01)

- 5. **Visible Emission Limit** - Visible emissions from the thermal oxidizer shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

(9 VAC 5-50-80, 9 VAC 5-50-260 and 9 VAC 5-50-20, Condition no. 24 of the NSR permit issued 1/25/01)

Periodic Monitoring and Recordkeeping

- 1. Each of the thermal oxidizers shall maintain a minimum combustion zone temperature of 1400°F and a residence time of 1 second. **The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone.**
(9 VAC 5-80-10 H, Condition no. 6 of the NSR permit issued 1/25/01)
- 2. The thermal oxidizer's combustion zone temperature readout graph shall be reviewed to determine if it is in compliance with the required 1400°F minimum combustion zone temperature and recorded once per shift.
(9 VAC 5-80-110 E and F and 9 VAC 5-50-20)
- 3. An annual calibration shall be performed on the current thermocouples with a redundant thermocouple and annual records stating when the calibration was performed along with the calibration results.
(9 VAC 5-80-110 E and F)
- 4. Periodic Monitoring of the average facial velocity of a minimum of 200 ft/min which corresponds to a pressure drop of 0.013 mm of Hg or 0.007 in. of H₂O as required for a permanent total enclosure designation shall be demonstrated by a differential pressure meter for the enclosure (the entire building is the permanent total enclosure). The differential pressure meter records shall be recorded and reviewed once per shift. In addition, verification of direction of air flow is inward shall be verified by a negative pressure which shall be recorded once per shift.
(9 VAC 5-80-110 E and F)

5. The emissions from the thermal oxidizer shall be observed visually at least once each calendar week for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. If the emissions unit is observed having any visible emissions, it shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. (9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

See Below:

Periodic Monitoring and Recordkeeping for P1, P2, P3 , PW1 (cleanup included with partswasher), T1 and T2:

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. Daily records for both (P1 and P3) presses, the (P2) paper coater, and the (PW1) partswasher shall demonstrate compliance with the requirements in **Air Quality Program Policies and Procedures, Number AQP-4 (Procedures for Maintaining Records for Surface Coating Operations and Graphic Arts Printing Processes)**.

Air Quality Program Policies and Procedures, Number AQP-4
states the following:

1. The owner shall maintain the following information at all times:
 - a. Coating application system number.
 - b. Hours of operation per day and per year.
 - c. Method of application.
 - d. Number and types of coats applied to the substrate.
 - e. Drying method.
 - f. Substrate type.
2. The owner shall maintain the following information for **each coating** at all times:
 - a. Supplier name, coating name and identification number.
 - b. Coating density (pounds per gallon).

- c. Volatile content of coating as supplied (percent by weight).
 - d. Water content of coating as supplied (percent by weight).
 - e. Exempt solvent content of coating as supplied (percent by weight).
 - f. Solids content of coating as supplied (percent by volume)
 - g. Name of diluent added, if any.
 - h. Identification number of diluent.
 - i. Diluent volatile organic compound density (pounds per gallon).
 - j. Volatile organic compound content of diluent (percent by weight).
 - k. Exempt solvent content of diluent (percent by weight).
 - l. Diluent/coating ratio (gallon diluent per gallon coating).
3. The owner shall maintain the following information for **each coating application system** on a **daily** basis:
- a. Coating application system number.
 - b. Time period of each application run.
 - c. Coating identification number.
 - d. Amount of coating used.
 - e. Diluent and clean up solvent identification numbers.
 - f. Amount of diluent used.
 - g. Amount of clean up solvents used.
 - h. Calculated volatile organic compound emissions.
4. Additional recordkeeping requirements for surface coating operations with add-on control systems.
- a. The owner shall maintain the following information at all times:
 - (1) Control device identification number and model number.
 - (2) Manufacturer.

- (3) Installation date.
- (4) Coating application systems controlled.
- (5) Whether or not the control device is always in operation when the system it is serving is in operation.
- (6) Type of control device.
- (7) Destruction or removal efficiency.
- (8) Date tested (if not tested, method of determining destruction efficiency).
- (9) Design combustion temperature (degrees Fahrenheit) for thermal incinerators.
- (10) Design exhaust gas temperature (degrees Fahrenheit), design temperature rise across catalyst bed (degrees Fahrenheit), and anticipated frequency of catalyst change for catalytic incinerators.
(Not applicable to Roslyn Converters)
- (11) Design inlet temperature of cooling medium (degrees Fahrenheit) and design exhaust gas temperature (degrees Fahrenheit) for a condenser.
(Not applicable to Roslyn Converters)
- (12) Design pressure drop across the adsorber at breakthrough, specific volatile organic compound species analyzed, and its concentration at breakthrough for a carbon adsorber.
(Not applicable to Roslyn Converters)
- (13) Emission test results, including inlet volatile organic compound concentration (parts per million), outlet VOC concentration (parts per million), method of concentration determination, and date of determination.
- (14) Type and location of capture system.
- (15) Capture efficiency (percent).
- (16) Method of determining capture efficiency.

- b. The yearly throughput of VOC to the (T1 and T2) storage tanks and the (PW1) parts washer calculated as the sum of each consecutive 12 month period.

- c. Records demonstrating each of the thermal oxidizers are in compliance with the minimum combustion zone temperature of 1400° F and minimum residence time of 1 second.
- d. Records stating when the calibration on the thermocouples were performed along with the calibration results.
- e. Records and results of the differential pressure meter(s) across the enclosure demonstrating compliance with the facial velocity of 200 ft/min in an inward direction which corresponds to a pressure drop of 0.013 mm Hg or 0.007 in. H₂O.
- f. Records shall be kept demonstrating the VOC content and HAP content of each coating material and solvents used in the facility. Acceptable records to demonstrate VOC content shall be the use of current material safety data sheets (MSDS) or current certified product data sheets (CPDS) provided the information contained therein is determined using approved EPA test methods (e.g. 40 CFR part 60 appendix A – EPA Method 24).
- g. Total of the previous twelve months' emissions which shall include:
 - a monthly material balance of VOCs used at the facility (i.e. Throughput of VOCs used in P1, P2, P3, PW1 and throughput of VOCs to the (T1 and T2) solvent storage tanks) along with the calculations of emissions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, condition no. 21 of the NSR permit issued 1/25/01 and 9 VAC 5-80-110 F)

III. Facility-wide and General Requirements

A. Facility-Wide Conditions and Permit Terms

(1) Facility-Wide Emission Limitations:

Facility wide emissions shall not exceed the limits specified below:

Volatile Organic			
Compounds	626.0 lbs/hr	15,022.2 lbs/day	405.0 tons/yr*

*Annual facility wide emissions shall be determined monthly as the sum of each consecutive 12 month period.

(9 VAC 5-50-80, 9 VAC 5-50-260 and 9 VAC 5-50-20, Condition no. 20 of the NSR permit issued 1/25/01)

If, for any reason, the permitted facility or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Piedmont Regional Office within four (4) business hours of the occurrence. The portion of the facility which is subject to the provision of Rule 4-3 or 5-3 (toxics) shall shut down immediately upon request of the DEQ. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shut down.
(9 VAC 5-20-180 C and 9 VAC 5-20-180 F3, Condition no. 24 of the NSR permit issued 1/25/01)

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions with respect to air pollution equipment, monitoring devices, and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 9 VAC 5-50-20 E, Condition no. 25 of the NSR permit issued 1/25/01)

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment, and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.1-340 through 2.1-348 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board), and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.
(9 VAC 5-170-60 and 9 VAC 5-20-160, Condition no. 27 of the NSR permit issued 1/25/01)

A copy of this permit shall be maintained on the premises of the facility to which it applies.
(9 VAC 5-170-160, Condition no. 28 of the NSR permit issued 1/25/01)

(2) 40 CFR Part 63 Subpart KK - Printing and Publishing Industry MACT Facility-Wide Conditions for an Area Source

1. Roslyn Converters shall use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
(40 CFR 63.820 (a)(2)(i))
2. Roslyn Converters shall use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
(40 CFR 63.820 (a)(2)(ii))
3. Conditions 1 and 2 may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline, and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).
(40 CFR 63.820 (a)(4))
4. If, Roslyn Converters, Inc. exceeds either of the thresholds in conditions 1 and 2 above for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment to be an area source for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of 40 CFR 63 Subpart KK as noted under 40 CFR 63.820(a)(1) and would no longer be eligible to use the provisions of 40 CFR 63.820(a)(2) or conditions 1 and 2, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2) or conditions 1 and 2.
(40 CFR 63.820 (a)(5))
5. If, Roslyn Converters, Inc. chooses to no longer be subject to 40 CFR 63.820(a)(2) or conditions 1 and 2 shall notify the Administrator of such change. If, by no longer being subject to 40 CFR 63.820(a)(2), Roslyn Converters' affected source becomes a major source:

Roslyn Converter must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) or conditions 1 and 2 until the source is in compliance with all relevant requirements for new affected sources under 40 CFR 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry).
(40 CFR 63.820 (a)(6))

6. Specific Facility Wide Recordkeeping Condition for an Area Source for 40 CFR Part 63 Subpart KK - Printing and Publishing Industry MACT:
Roslyn Converters, Inc. shall maintain records of all required measurements and calculations needed to demonstrate compliance with 40 CFR 63.820(a)(2) or conditions 1 and 2, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
(40 CFR 63.829 (d))

(3) New source standard for visible emissions

Unless otherwise specified in this part, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. This standard is applicable to emission units H1, H2, HC1, HC2, HC3, HC4, T1 and T2.
(9 VAC 5-50-80)

(4) Startup, Shutdown and Malfunction

At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20)

B. General Permit Conditions

(1) General Recordkeeping and reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)
2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (i) Exceedance of emissions limitations or operational restrictions;
 - (ii) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (iii) Failure to meet monitoring/recordkeeping or reporting requirements contained in this permit
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

(2) Failure/Malfunction Reporting

If, for any reason, the affected facilities or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Piedmont Regional Office within four (4) daytime business hours of the occurrence. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shut down.

(9 VAC 5-20-180)

(3) Permit Deviation Reporting

The permittee shall notify the Piedmont Region, within four daytime business hours, after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Recordkeeping and Reporting Condition 3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

(4) Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

(5) Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

(6) Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

(7) Permit Action for Cause

This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(9 VAC 5-80-110 G.4)

(8) Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

(9) Duty to Submit Information

The permittee shall furnish to the board, within a reasonable time, any information that the board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

Any document (including reports) required in a permit condition to be submitted to the board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

(10) Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

(11) Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355 (Rule 8-6 of the Regulations).

(9 VAC 5-80-110 H)

(12) Changes to Permits for Emissions Trading

No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

(13) Alternative operating scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

(14) Inspection and entry requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

(15) Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to § 114(a)(3) and § 504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- The time period included in the certification. The time period to be addressed is January 1 to December 31.
- The identification of each term or condition of the permit that is the basis of the certification.
- The compliance status.
- Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3APOO)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

(16) Reopening For Cause

The permit shall be reopened by the board if additional federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

(9 VAC 5-80-110 L)

The permit shall be reopened if the board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

(9 VAC 5-80-110 L)

The permit shall be reopened if the administrator or the board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(9 VAC 5-80-110 L)

The permit shall not be reopened by the board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

(17) Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

(18) Transfer of Permits

No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

(19) Permit Expiration

This permit shall become invalid five years from the date of issuance. The permittee shall submit an application for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.

(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

(20) Malfunction as an Affirmative Defense

A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

- A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
- The permitted facility was at the time being properly operated.
- During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
- For malfunctions that occurred for one hour or more, the permittee submitted to the board by the deadlines described in **Condition B. Malfunction/Failure Reporting** above, a notice and written statement containing a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notice fulfills the requirement of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements.

In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

(9 VAC 5-80-250)

(21) Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 80 Article 1. The board may suspend, under such conditions and for such period of time as the board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-260)

(22) Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

C. Permit Shield

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been explicitly deemed to be not applicable to this permitted facility:

Citation	Title of Citation	Description of applicability
NA	NA	NA

Nothing in this permit shield shall alter the provisions of § 303 of the Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the (i) administrator pursuant to § 114 of the Clean Air Act, (ii) the Board pursuant to § 10.1-1314 or § 10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to § 10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

D. State-only Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

Odor

State toxics rule

(9 VAC 5-80-110 N)